

EXHIBIT O

during the April 21 Call. The Debtors further state that this Request seeks information that is more appropriately obtained during a 30(b)(6) deposition.

INTERROGATORY NO. 5

Please describe in detail the Debtors' marketing efforts for the sale of any of the FWE I Assets from the time Debtors began discussing the filing of the Bankruptcy Cases with their lenders to the present.

RESPONSE:

The FWE I Assets were not included as part of the June 2020 marketing process. In connection with the filing of the Disclosure Statement in January 2021, the Debtors invited offers on substantially all of the Debtors' assets:

To help facilitate a smooth path towards consummation of the Plan and the Credit Bid Transaction, the Debtors and the Ad Hoc Group of Secured Lenders seek approval of a proposed outside date by which any third party must submit a qualified bid to acquire either (i) the Credit Bid Acquired Interests (as defined in the Credit Bid Purchase Agreement) or (ii) substantially all of the Debtors' assets in accordance with the requirements set forth below (each, a "Qualified Bid" and such bidder a "Qualified Bidder") by February 26, 2021.

Motion of Debtors for Entry of Order (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing; (II) Establishing Solicitation and Voting Procedures; (III) Scheduling Confirmation Hearing; (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan; (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases; (VI) Approving Procedures for Objections to the Assignment and Transfer of Property of The Estate; (VII) Approving Bid Submission Deadline and Procedures for Submission of Higher or Better Bids; and (VIII) Granting Related Relief Filed by Debtor Fieldwood Energy LLC, ¶ 96 (Docket No. 724).

The Debtors will continue to consider such proposals pursuant to certain procedures as provided for in the Disclosure Statement Motion (as defined below). Such procedures provide, among other things, that in evaluating whether any third-party bids qualify as a Qualified Bid (as defined in the

Disclosure Statement Motion), the Debtors may consider several factors including, but not limited to, (i) the amount and form of consideration of the purchase price, (ii) the assets included in or excluded from the bid, (iii) the value to be provided to the Debtors and their estates, (iv) the transaction structure and execution risk, and (v) the impact on all key stakeholders. Moreover, to the extent the Debtors receive one or more Qualified Bids on or before the Bid Deadline, the Debtors shall, no later than three (3) Business Days after the Bid Deadline, file with the Court a notice of receipt of such Qualified Bid(s) and the Debtors' proposed procedures for selecting the highest or otherwise best bid, including, but not limited to, any procedures for submitting revised bids and/or holding an auction to the extent the Debtors determine holding an auction will maximize value to the Debtors' estates. For the avoidance of doubt, the Credit Bid Purchaser (i) shall be deemed a Qualified Bidder that is allowed to participate in any bidding and auction process held by the Debtors and (ii) may increase the Credit Bid Amount of their proposal up to the FLTL Claims Allowed Amount of \$1,142,688,815.28 in principal plus any accrued but unpaid interest or fees under the Prepetition FLTL Credit Agreement as of the Petition Date.

Disclosure Statement, sec. I.3.C. (Further Transaction Proposals) (Docket No. 723).

INTERROGATORY NO. 6

Please describe all communications between the Debtors and third parties relating to the sale of any of the FWE I lease interests from the time Debtors began discussing the filing of the Bankruptcy Cases with their lenders to the present. In your answer please include (1) the date of the communication, (2) the time of the communication, (3) the parties to the communication and individuals with knowledge of the communication, (4) the substance of the communication, (5) amount offered, and (6) the applicable lease interest(s).

RESPONSE:

The Debtors are not aware of any such communications.

INTERROGATORY NO. 7

Please identify the FWE I leases that are shut in and will be allowed to expire.

RESPONSE:

As addressed on the April 21 Call, the Debtors constantly monitor and file SOPs when appropriate. The Debtors' answers may be found in the documents, "RTP Details"